

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

MIGRANT JUSTICE and MATT CAMERON,)	
)	
Plaintiffs,)	Case No. 2:17-CV-197
)	
v.)	
)	
UNITED STATES DEPARTMENT OF)	
HOMELAND SECURITY, UNITED STATES)	
CUSTOMS AND BORDER PROTECTION, and)	
UNITED STATES IMMIGRATION AND)	
CUSTOMS ENFORCEMENT,)	
)	
Defendants.)	
)	

**STIPULATED MOTION FOR A STAY OF
ALL DEADLINES IN LIGHT OF LAPSE OF APPROPRIATIONS**

The Federal Defendants hereby move for a stay of all deadlines in the above-captioned case.

1. At midnight on December 21, 2018, the continuing resolution that had been funding the Department of Justice expired and appropriations to the Department lapsed. The Department does not know when funding will be restored by Congress.

2. Absent an appropriation or continuing resolution, Department of Justice civil division attorneys are prohibited from working, even on a voluntary basis, except in limited circumstances, including “emergencies involving the safety of human life or the protection of property.” 31 U.S.C. § 1342.

3. Undersigned counsel for the Department of Justice therefore requests a stay of the deadlines in this litigation until Congress has restored appropriations to the Department.

4. If this motion for a stay is granted, counsel for the Government will notify the Court as soon as Congress has appropriated funds for the Department or enacted another continuing resolution.

The Government requests that, at that point, any deadlines be extended commensurate with the duration of the lapse in appropriations.

5. Opposing counsel has stated that Plaintiffs do not object to this motion.

Therefore, although we greatly regret any disruption caused to the Court and Plaintiffs, the Government hereby moves for a stay of the deadlines in this case until Department of Justice attorneys are permitted to resume their usual civil litigation functions.

Dated: January 2, 2019 at Burlington, Vermont.

By: /s/ Owen Foster
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